# UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

20-09505 BKAOD01 BROCK & SCOTT, PLLC 302 Fellowship Rd, Suite 130 Mount Laurel, NJ 08054 (844) 856-6646

Attorneys for Freedom Mortgage Corporation

In Re:

KEVIN MICHAEL O'CONNOR

Order Filea on September 21, 2021 by Clerk U.S. Bankruptcy Court District of New Jersey

Case No: 19-31145-CMG

Hearing Date: September 1, 2021

Judge: CHRISTINE M.

GRAVELLE

Chapter: 13

#### CONSENT ORDER RESOLVING CREDITOR'S CERTIFICATION OF DEFAULT

The consent order set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED** 

DATED:

Honorable Christine M. Gravelle United States Bankruptcy Judge

DATED: September 21, 2021

Honorable Christiné M. Gravelle United States Bankruptcy Judge UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

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The Consent Order pertains to the property located at 115 Hawthorne St, Neptune, NJ 07753 ("Property"), mortgage account ending with "1706";

This Matter having been brought before the Court by Freedom Mortgage Corporation ("Creditor") by and through its attorneys, Brock and Scott, PPLC, having filed a Certification of Default and the parties having subsequently resolved their differences; and the Court noting the consent of the parties of the form, substance and entry of the within Order, and for other and good cause shown:

- 1. The Parties agree that the Property is currently subject to an agreement of sale, and the closing of the sale will result in payment of Creditor's Secured Claim in full.
- 2. The Parties agree that the sale of the Property must close and payoff funds received by Creditor by September 30, 2021.
- 3. The Creditor agrees that upon receipt of sufficient funds to pay off its Secured Claim in full, Creditor will withdraw the Certificate of Default.

4. The Debtor agrees that if the Certificate of Default is not withdrawn by September 30, 2021, the Court shall enter the Order for Relief attached to the Certificate of Default without any further notice.

The undersigned hereby consent to the form, Content and entry of the within Order:

BROCK AND SCOTT, PLLC Freedom Mortgage Corporation By Its Attorney,

/s/ Matthew Fissel
Matthew Fissel
(Bar No. 038152012)
Attorney for Creditor
BROCK & SCOTT, PLLC
302 Fellowship Road
Suite 130

Mount Laurel, NJ 08054 Telephone: 844-856-6646 x 4535

Facsimile: 704-369-0760

Dated: September 3, 2021

E-Mail: Matthew.Fissel@brockandscott.com

DEBTOR(S)
By Their Attorney,

William H. Oliver, Jr, Esquire Attorney for Debtor(s) 2240 Highway 33, Suite 112, Neptune, NJ 07753

Phone Number: 732) 988-1500

Fax: (732) 775-7404 Email: bkwoliver@aol.com

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United States Bankruptcy Court District of New Jersey

In re: Case No. 19-31145-CMG

Kevin Michael O'Connor Chapter 13

Debtor

CERTIFICATE OF NOTICE

District/off: 0312-3 User: admin Page 1 of 2
Date Rcvd: Sep 21, 2021 Form ID: pdf903 Total Noticed: 1

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 23, 2021:

Recipi ID Recipient Name and Address

db Kevin Michael O'Connor, 115 Hawthorne Street, Neptune, NJ 07753-3917

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

#### BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## **NOTICE CERTIFICATION**

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 23, 2021 Signature: /s/Joseph Speetjens

#### CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 21, 2021 at the address(es) listed below:

Name Email Address

Albert Russo

docs@russotrustee.com

Albert Russo

on behalf of Trustee Albert Russo docs@russotrustee.com

Andrew L. Spivack

on behalf of Creditor FREEDOM MORTGAGE CORPORATION and rew. spivack@brock and scott.com

wbecf@brockandscott.com

Andrew L. Spivack

on behalf of Creditor Freedom Mortgage Corporation andrew.spivack@brockandscott.com wbecf@brockandscott.com

Denise E. Carlon

on behalf of Creditor Toyota Motor Credit Corporation dcarlon@kmllawgroup.com bkgroup@kmllawgroup.com

Gavin Stewart

on behalf of Creditor Toyota Motor Credit Corporation bk@stewartlegalgroup.com

Matthew K. Fissel

on behalf of Creditor Freedom Mortgage Corporation wbecf@brockandscott.com matthew.fissel@brockandscott.com

Matthew K. Fissel

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District/off: 0312-3 User: admin Page 2 of 2
Date Rcvd: Sep 21, 2021 Form ID: pdf903 Total Noticed: 1

on behalf of Creditor FREEDOM MORTGAGE CORPORATION wbecf@brockandscott.com

matthew.fissel@brockandscott.com

Nicole Marie Savage

on behalf of Creditor FREEDOM MORTGAGE CORPORATION nicole.savage@brockandscott.com

Robert P. Saltzman

on behalf of Creditor Freedom Mortgage Corporation dnj@pbslaw.org

Robert W. Keyser

on behalf of Creditor BB 316 Investments LLC rkeyser@taylorandkeyser.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

William H. Oliver, Jr.

on behalf of Debtor Kevin Michael O'Connor courtdocs@oliverandlegg.com R59915@notify.bestcase.com

TOTAL: 13